

MANCHANDA LAW OFFICE PLLC
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FILED
U.S. BANKRUPTCY COURT
SDNY
2023 JUN 12 A 11:10
SDNY

June 11, 2023

VIA HAND DELIVERY

Honorable Bankruptcy Court
SDNY White Plains New York
300 Quarropas Street
White Plains, New York 10601

RE: Bankruptcy Case No 23-22095

Dear Honorable Court:

In furtherance to our previous, comprehensive, and timely Discovery Responses to AUSA Dana Walsh Kumar and AUST Gregory Zipes, as well as our duly filed Motion to Quash and Interlocutory Appeals, in addition to our formal complaints to defend our Attorney-Client and Employer-Employee Confidentiality Privileges backed up by many others of the 3 branches of U.S. Government (attached) which directly challenge this Honorable Court's Orders or these US Attorneys' unconstitutional, illegal and unethical further demands, we hereby also remind this Honorable Court that with regard to the other intrusive and invasive secondary demands for even more loan documentation than what we have already voluntarily given them, we underscore that we are severely limited in providing anything further, because any and all relevant loans that these two demand for even MORE documentation for, we are unable to comply because these loans were not prepared or filed by undersigned in any capacity - they were fully prepared and filed by the fully paid for professional loan companies Jacob Rotman of SBG Funding and Jayanthi Ganapathy of FinAccurate LLC. We simply do not have any further relevant business loan information to provide these two abusive U.S. Attorneys Walsh and Zipes, so they must direct their additional loan-related subpoenas and discovery demands to those two loan agents listed above.

Be guided accordingly.



Rahul D. Manchanda, Esq.
Manchanda Law Office PLLC
270 Victory Boulevard
New Rochelle, New York 10804

Subject: Confirmation: OSHA Online Safety and Health Complaint / Complaint filed on 06/10/2023
From: OSHA-Complaint@osha.gov
Date: 6/10/2023, 4:27 PM
To: INFO@MANCHANDA-LAW.COM

Thank you for your submission. Your Safety and Health complaint was received on June 10, 2023 03:24:09 PM US Central Time. Please print or save a copy of this email for your records.

Your reference number is 32120.

An OSHA representative may contact you using the contact information provided in your complaint. It is important that you respond. OSHA may need additional information to proceed with your complaint. If you have any questions regarding the status of your complaint, contact your local OSHA Regional or Area Office at <https://www.osha.gov/contactus/bystate>.

Note: Do not reply to this email. It was generated by the system and this email account is not monitored.

Subject: 28906486 for complaint submitted to Office for Civil Rights

From: Portal <OCR_Portal@nih.gov>

Date: 6/10/2023, 4:34 PM

To: INFO@MANCHANDA-LAW.COM

28906486

Thank you for contacting the U.S. Department of Health and Human Services, Office for Civil Rights (OCR). OCR enforces federal civil rights laws which prohibit discrimination in the delivery of health and human services based on race, color, national origin, disability, age, sex, religion, and the exercise of conscience, and also enforces the Health Insurance Portability and Accountability Act (HIPAA) Privacy, Security and Breach Notification Rules.

Please do not fax, email, or mail a copy of this complaint to us as that may delay the processing of your complaint.

If you have any additional questions or need a reasonable accommodation, please contact OCR's Customer Response Center at 1-800-368-1019, Monday through Friday, 8:00 am to 6:00 pm, ET.

Subject: FILING CHARGE AGAINST AUSA DANA WALSH KUMAR & AUST GREGORY ZIPES & SDNY JUDGE SEAN LANE

From: "RAHUL MANCHANDA, ESQ." <rdm@manchanda-law.com>

Date: 6/10/2023, 4:01 PM

To: 12122642450@efaxsend.com, relay.service@nlrb.gov, rose.wong@nlrb.gov, OIGHOTLINE@nlrb.gov, publicinfo@nlrb.gov

*National Labor Relations Board
Regional Office 02 - New York, NY*

*26 Federal Plz, Ste 36-130
New York, NY 10278-3699
United States*

Tel: (212) 264-0300

Fax: (212) 264-2450

RE: FILING CHARGE AGAINST AUSA DANA WALSH KUMAR & AUST GREGORY ZIPES & SDNY JUDGE SEAN LANE

As per the attached signed complaint, Southern District of New York Assistant US Attorney Dana Walsh Kumar and Assistant US Trustee Greg Zipes are coercing and forcing me to reveal confidential past and current employee salary information, names, social security numbers, wages, bonuses, taxes, and other protected information that they have no right to under United States and New York State Labor Laws as part of my bankruptcy case no 23-22095 in the Southern District of New York White Plains presided over super compliant and corrupt Judge Sean Lane. Please immediately intervene, investigate, and advise.

Kind regards,

--

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Suite 8207
New York, NY 10005
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—Attachments:_____

508_3-21 (1).pdf

217 KB

Subject: Form submission from: How to File a Complaint with the Office of Professional Responsibility
From: "Department of Justice via Department of Justice" <no-reply@usdoj.gov>
Date: 6/8/2023, 9:17 PM
To: INFO@MANCHANDA-LAW.COM

Submitted on: Thursday, June 8, 2023 - 9:17pm EDT
Submitted to: Anonymous
Submitted values are:

Name of person seeking OPR's action (Complainant)*: Mr.
First: RAHUL
Middle: DEV
Last: MANCHANDA
Suffix (if applicable): ESQ
Complainant Type: Private Attorney
Inmate/Detainee Number:
Other:
Company/Organization: MANCHANDA LAW OFFICE PLLC
Complainant mailing address: 30 WALL STREET, 8TH FLOOR, SUITE 8207
City: NEW YORK
State: New York
Zip: 10005
Complainant email address: INFO@MANCHANDA-LAW.COM
Complainant phone number: 2129688600
Complainant fax number: 2129688601

If you are filing this complaint as a legal or other representative of the Complainant, please provide the following information:
Name and title of the filer:
First:
Middle:
Last:
Suffix (if applicable):
Your preferred mailing address:
City:
State:
Zip:
Your email address:

Information about the DOJ Attorney or DOJ Law Enforcement Official You Are Complaining About (Subject)

Name of the person(s) you are complaining about (Subject): Ms.
First: DANA
Middle: WALSH
Last: KUMAR
Suffix (if applicable):
Subject's Job Title: Assistant United States Attorney (AUSA)
Other:
Company/Organization: SDNY US ATTORNEYS OFFICE
Location of Subject's Office: 86 CHAMBERS STREET, NEW YORK NY 10007

Does your complaint involve more than one person? Yes (If yes, please provide the following information of the additional subject.)

Name of the person(s) of the second subject:

First: GREG

Middle:

Last: ZIPES

Suffix (if applicable):

Second Subject's Job Title: Assistant United States Trustee

Location of second subject's office: 1 BOWLING GREEN, NEW YORK NY 10004

Information about your complaint

What are the actions, events, or allegations that you are reporting to OPR? (e.g., attorney misconduct, Whistleblower retaliation, Giglio/Brady violation, etc.): Attorney Misconduct

When did the incident occur?: Thu, 05/11/2023

*Please provide a brief description summarizing the:

- * reason(s) for your complaint including the details, actions, events, or allegations,
- * case names,
- * potential witnesses and their involvement,
- * where the incident occurred,
- * how the incident occurred, and
- * any corrective actions already taken
- * For ***Whistleblower complaints only*** - describe the personnel action(s)

that occurred or failed to occur because of a protected disclosure: (an appointment, a promotion, an action under 5 U.S.C. Chapter 75 or other disciplinary or corrective action; a detail, transfer, or reassignment; a reinstatement; a restoration; a reemployment; a decision about pay, benefits or awards, concerning education or training if the education or training may reasonably be expected to lead to an appointment, promotion, performance evaluation or other action described in 5 U.S.C. § 2302 (a)(2); a performance evaluation under 5 U.S.C. Chapter 43; a decision to order psychiatric testing or examination; or any other significant change in duties, responsibilities, or working conditions.)

Please provide a brief summary of the complaint:

Southern District of New York Assistant US Attorney Dana Walsh Kumar and Assistant US Trustee Greg Zipes are coercing and forcing me to reveal confidential past and current employee salary information, names, social security numbers, wages, bonuses, taxes, and other protected information that they have no right to under United States and New York State Labor Laws as part of my bankruptcy case no 23-22095 in the Southern District of New York White Plains presided over super compliant and corrupt Judge Sean Lane. In violation of FRCP Rules 26 and 45, (1) SDNY Judge Sean Lane referred to his own verbally and vaguely approved document discovery demands by the invasive and abusive AUSA Dana Walsh and AUST Greg Zipes as a "fishing expedition," which was then even repeated to describe his own discovery demands using the same phrase by Greg Zipes himself, thus betraying their own mental states and full knowledge that their demands are altogether illegal, unethical, immoral, violate the attorney-client privilege for thousands of my clients, as well as violate the labor laws and privacy protections of scores of my law firm employees past and present, as well as force me to both obtain and produce

formerly closed bank account records for many years bank statements within an unreasonably short period of time, that have not as of yet been properly treated, accounted for, bookkeeping, deducted, redacted, exempted, or presented as per my annual tax returns, which is my constitutional right to do; (2) even more frightening and related to the above, AUSA Dana Walsh let it slip that she is accusing me of "co-mingling funds" when that is not only false and defamatory, but illegal and unethical in New York as a lawyer, and for which I could be disbarred or jailed - I had to aggressively counter her false and defamatory allegations for the record, because not only does our law firm NOT deal with real estate or personal injury cases requiring an escrow account, but that it is common knowledge that in New York State lawyers are allowed to deposit retainer fees, personal and business loans (as well as gifts) into their operating/checking account for day to day business and operating costs (as opposed to other states) - this kind of sloppy, careless, ignorant, mean-spirited, unethical, false, defamatory, and dangerous kind of talk on the public record is another reason in my opinion why Judge Sean Lane has not reduced their discovery demands to an Order (as I would appeal it in 15 seconds) but rather he has stated "just do the best you can and we will discuss it all at our next court date of June 14, 2023," truly a landmine-filled kangaroo court legal proceeding which now that Judge Sean Lane has allowed my fully paid for lawyer Bruce Bronson to unethically and illegally withdraw, has left me lawyer-less and rudder-less, susceptible to all sorts of traps, pitfalls, and word salads by AUSA Dana Walsh Kumar, AUST Greg Zipes and others, designed to deny me due process, a fair bankruptcy proceeding, causing me to trip and fall; (3) I remind this court that Judge Lane still has not either acknowledged or called to the mat Federica Romanelli of the New York County Lawyers Association, who continues to flagrantly and blatantly violate the automatic bankruptcy stay on this case, allowing former client after former client to continue to prepare and file legal fee disputes, collection actions, lawsuits, and fee disputes left and right, with the New York Civil Court located at 111 Centre Street, New York NY 10013 not even notifying me of court dates, so that default judgments are piling up all around me in an absolute and coordinated manner, simply because in my opinion he hates me so much - Judge Sean Lane even commented on the record that "wow, I can't believe that these people won't abide by the automatic bankruptcy stay," while apparently chuckling and giggling - meanwhile my Contempt Motion duly filed against Federica Romanelli filed back in February 2023, goes un-answered, un-heard, and un-ruled upon by Judge Sean Lane, while Federica Romanelli keeps aiding and abetting these multiple bankruptcy stay violations. The SDNY court for the district where compliance is required must quash or modify a subpoena that: (i) fails to allow a reasonable time to comply; (ii) requires a person to comply beyond the geographical limits specified in Rule 45(c); (iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or (iv) subjects a person to undue burden. Furthermore Pursuant to FRCP Rule 26, dealing with Discovery Scope and Limits, parties may obtain discovery regarding any non-privileged matter...the parties' relative access to relevant information, the parties' resources...and whether the burden or expense of the proposed discovery outweighs its likely benefit. Furthermore, regarding Specific Limitations on Electronically Stored Information, a party need not provide discovery of electronically stored information from sources that the party identifies as not reasonably accessible because of undue burden or cost. Undersigned has already shown that the information is not reasonably accessible because of undue burden or cost. As we have made abundantly clear not only to AUST Gregory Zipes, this Honorable Court, the relevant attorney trustee committees, attorney and judicial misconduct committees as per the attached complaints, questions arise only as to three remaining demands out of nineteen (we have substantially complied) made by Ms Walsh (and Mr Zipes) and they fall well within the carved out exceptions of Rule 26. Gregory Zipes and the Court should be satisfied that we have not

only provided him with everything else that he asked for, but even partially the 3 remaining as well, subject to the proscriptions described above. Please immediately intervene, investigate, and advise.

Certification and Signature (Enter your initials here to certify and sign this form.): RDM

Subject: IdentityTheft.gov Reference Number
From: no-reply@identitytheft.gov
Date: 6/8/2023, 10:03 PM
To: INFO@MANCHANDA-LAW.COM

Thank you for reporting identity theft to the FTC.

This is not your temporary password. Your temporary password will come in a separate email.

Your reference number is:

160633542

Keep this for your records.

To view and update your personal recovery plan, log in at IdentityTheft.gov.

Subject: LABOR COMPLAINT AGAINST SDNY AUSA DANA WALSH KUMAR AND AUST GREG ZIPES AND SDNY JUDGE SEAN LANE

From: "RAHUL MANCHANDA, ESQ." <rdm@manchanda-law.com>

Date: 6/8/2023, 9:02 PM

To: OLPS@dcwp.nyc.gov

NYC CONSUMER AND WORKER PROTECTION

Office of Labor Policy & Standards (OLPS)

42 Broadway, 9th floor

New York, NY 10004

RE: LABOR COMPLAINT AGAINST SDNY AUSA DANA WALSH KUMAR AND AUST GREG ZIPES AND SDNY JUDGE SEAN LANE

As per the attached complaint, Southern District of New York Assistant US Attorney Dana Walsh Kumar and Assistant US Trustee Greg Zipes are coercing and forcing me to reveal confidential past and current employee salary information, names, social security numbers, wages, bonuses, taxes, and other protected information that they have no right to under United States and New York State Labor Laws as part of my bankruptcy case no 23-22095 in the Southern District of New York White Plains presided over super compliant and corrupt Judge Sean Lane.

Please immediately intervene, investigate, and advise.

Kind regards,

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—Attachments:—

Workplace Inquiry and Complaint Form.pdf

143 KB

Subject: PRIVACY COMPLAINT AGAINST AUSA DANA WALSH KUMAR AND AUST GREG ZIPES AND SDNY BANKRUPTCY JUDGE SEAN LANE

From: "RAHUL MANCHANDA, ESQ." <rdm@manchanda-law.com>

Date: 6/8/2023, 10:23 PM

To: privacy@usdoj.gov

Office of Privacy and Civil Liberties
Two Constitution Square (2CON)
145 N Street, NE
Suite 8W.300
Washington DC 20530

RE: PRIVACY COMPLAINT AGAINST AUSA DANA WALSH KUMAR AND AUST GREG ZIPES AND SDNY BANKRUPTCY JUDGE SEAN LANE

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Additionally they are forcing me to disclose thousands of protected and privileged law firm clients attorney-client privilege and confidentiality, through this illegal and unethical "fishing expedition."

Please immediately intervene, investigate, and advise.

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From: "RAHUL MANCHANDA, ESQ." <rdm@manchanda-law.com>

Date: 6/8/2023, 10:34 PM

To: directives@doc.gov, CCutshall@DOC.GOV, TMurphy2@doc.gov, CPO@doc.gov, 12024820827@efaxsend.com

U.S. Department of Commerce
Office of Privacy and Open Government
1401 Constitution Avenue, NW
Mail Stop 61025
Washington, DC 20230

Charlie Cutshall
Director, Office of Privacy & Open Government
Senior Agency Official for Privacy (SAOP) and
Departmental Chief Privacy Officer (CPO)

RE: PRIVACY COMPLAINT AGAINST AUSA DANA WALSH KUMAR AND AUST GREG ZIPES AND SDNY BANKRUPTCY JUDGE SEAN LANE

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Subject: Successful transmission to 12122642450. Re: FILING CHARGE AGAINST AUSA DANA WALSH KUMAR & AUST GREGORY ZIPES & SDNY JUDGE SEAN LANE
From: send@mail.efax.com
Date: 6/10/2023, 4:04 PM
To: rdm@manchanda-law.com



Your fax was successfully sent to 12122642450 by eFax.

Fax Details

Date: 2023-06-10 20:04:41 (GMT)
Number of Pages: 4
Length of Transmission: 133 seconds
Receiving Machine Fax ID: NLRB

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700 S. Flower St., 15th Floor, Los Angeles, CA 90017

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Subject: Successful transmission to 12123154906. Re: FILING CHARGE AGAINST AUSA
DANA WALSH KUMAR & AUST GREGORY ZIPES & SDNY JUDGE SEAN LANE
From: send@mail.efax.com
Date: 6/10/2023, 4:05 PM
To: rdm@manchanda-law.com



Your fax was successfully sent to 12123154906 by eFax.

Fax Details

Date: 2023-06-10 20:05:19 (GMT)
Number of Pages: 4
Length of Transmission: 134 seconds
Receiving Machine Fax ID: 2129688601

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700 S. Flower St., 15th Floor, Los Angeles, CA 90017

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Subject: Automatic reply: Zip code: 10005 - Employment & Training, Small Business Services, Wages, Other/Unknown/Unsure

From: DOLWHD-ContactUs <DOLWHD-ContactUs@dol.gov>

Date: 6/8/2023, 8:47 PM

To: "INFO@MANCHANDA-LAW.COM" <INFO@MANCHANDA-LAW.COM>

Thank you for contacting the United States Department of Labor.

Your inquiry is very important to us and we hope to provide you with valuable information, referrals, and resources to workplace and labor related topics.

We will review your email and work to connect you with appropriate resources or resolve your inquiry. Depending on the complexity of the request, please allow us up to 10 business days to respond to your inquiry. Also, please keep a copy of this e-mail for your own personal records. If you do not hear a response from us in a timely manner, please call our main telephone number at 1-866 4 US WAGE (1-866-487-9243) to be routed to your local Department of Labor Wage and Hour office.

Thank you,
U.S. Department of Labor

The contents of this message are provided as a public service to enhance public access to general information on Department of Labor programs. The accuracy and timeliness of information is under regular development and review. While we try to maintain the reliability of the general information we present publicly, you should be mindful that you remain responsible for actions you take on the basis of this information. We will make every effort to correct errors brought to our attention

NOTE: This is a system generated message. Please do not reply to it.